

EXHIBIT B
CHART OF ALLEGED DEFAMATORY SCENES

<u>Scene No.</u>	<u>Episode/ Time</u>	<u>Challenged Scene/ Complaint Allegations</u>	<u>Specific Grounds for Dismissal in Motion</u>
1.	Ep. 1, 7:30-8:50	<p>Scene depicting Fairstein character at Meili crime scene April 20, 1989 (Compl. ¶ 52)</p> <p>Fairstein character says “[m]ake sure to get those drag marks.... Clear as day. His footsteps, her body”. (<i>Id.</i>)</p>	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Plaintiff’s interpretation uses improper innuendo • Further, Plaintiff admittedly visited crime scene with detectives; fact that she was not at crime scene at a specific date/time not defamatory given context of scene and broader context of film dramatization where times and places are compressed. <p><i>Def. Memo at 5, 14-15.</i></p>
2.	Ep. 1, 8:50-9:26	<p>Scene depicting Fairstein character “drafting a press release to give to reporters” on April 20 (Compl. ¶ 59)</p>	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Plaintiff’s interpretation uses improper innuendo <p><i>Def. Memo at 15.</i></p>
3.	Ep. 1, 11:00-12:38	<p>Scene depicting room of teenage boys “allegedly involved in the attacks in Central Park”</p> <p>Fairstein character asks what “wilding” means and talks to one of the boys (Compl. ¶¶ 65-66)</p>	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Plaintiff’s interpretation uses improper innuendo • Substantial truth based on public and judicially noticeable records containing Plaintiff’s prior public statements using phrase “wilding” to describe the Five teens <p><i>Def. Memo at 22-23, 26-29.</i></p>

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4.	Ep. 1, 15:58-16:52; 34:45-36:24	Scenes at stationhouse depicting Fairstein character “Putting Together a Timeline” (Compl., p. 22, ¶¶ 79, 83)	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Substantial truth based on public and judicially noticeable records containing Plaintiff’s prior public statements supporting and defending timeline and prosecution theory connecting the Five to the rape of the Jogger in the park • Further, Plaintiff admittedly was present at police stations for 30-plus hours during investigation; fact that she was not at a specific precinct at a specific time not defamatory given context of scene and broader context of film dramatization where times and places are compressed. <p><i>Def. Memo at 5, 16-17.</i></p>
5.	Ep. 1, 16:53-19:48	<p>Scenes depicting Fairstein character “Fighting with Nancy Ryan Over Who Would Prosecute Case” in phone call with DA Morgenthau and briefing police (Compl., p. 25, ¶¶ 88, 90, 94)</p> <p>Fairstein and Ryan characters debate “case’s merits” and whether teens in custody “engaged in nothing more than harassment in Central Park on night in question” (¶¶ 93-95)</p>	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Dialogue is nonactionable opinion/rhetorical hyperbole used for dramatic purposes, particularly when viewed in literary context of dramatization with a clear point of view and scene using imagined dialogue to present different sides of debate and fraught circumstances following crime <p><i>Def. Memo at 15, 20.</i></p>

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6.	Ep. 1, 19:54-20:30	Scene at stationhouse depicting Fairstein character calling for police officers to roundup “that whole group ... every little thug you see ... every kid who was in the park last night” (Compl. ¶ 97)	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Dialogue is nonactionable opinion/rhetorical hyperbole used for dramatic purposes, particularly when viewed in literary context of dramatization with a clear point of view and scene reflecting fraught circumstances following crime • Substantial truth regarding Plaintiff’s use of harsh language to describe suspects in the Central Park crimes based on public and judicially noticeable records containing Plaintiff’s prior similar statements about the Five and others <p><i>Def. Memo at 26-29.</i></p>
7.	Ep. 1, 22:35-22:56	Scene at stationhouse depicting Fairstein character addressing police officers, saying “No kid gloves here” (Compl. ¶ 104)	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Dialogue is nonactionable opinion/rhetorical hyperbole used for dramatic purposes, particularly when viewed in literary context of dramatization with a clear point of view and scene reflecting fraught circumstances following crime <p><i>Def. Memo at 22, 24.</i></p>

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8.	Ep. 1, 47:42-51:01, 52:25	Scenes depicting Fairstein character discussing witness statements with ADA Lederer: Fairstein character expresses her belief that “they’re all guilty, each of these boys assaulted Patricia Meili” because in their confessions “they all bear eyewitness against each other” (Compl. ¶ 108); Lederer character points out problems with the statements / evidence (<i>id.</i> ¶¶ 110-114)	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Dialogue is nonactionable opinion/rhetorical hyperbole used for dramatic purposes, particularly when viewed in literary context of dramatization with a clear point of view and scene using imagined dialogue to present different sides of debate • Substantial truth based on public and judicially noticeable records containing Plaintiff’s publicly stated views supporting and defending theory of the prosecution, confessions of the Five as valid and guilt of the Five for rape <p><i>Def. Memo at 7-9, 18-19, 24-25.</i></p>
9.	Ep. 2, 16:39-17:14	Scene depicting prosecutors’ discussion of DNA evidence found on sock prior to results of testing same (Compl. ¶ 118)	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Plaintiff’s interpretation uses improper innuendo <p><i>Def. Memo at 22, 25-26.</i></p>
10.	Ep. 2, 29:51-32:23	Scene depicting exchanges between Fairstein and Lederer characters when they learn that the sock DNA is not a match to any of The Five (Compl. ¶¶ 120-22)	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Dialogue is nonactionable opinion/rhetorical hyperbole used for dramatic purposes, particularly when viewed in literary context of dramatization with a clear point of view and scene using imagined dialogue to present different sides of debate • Substantial truth based on public and judicially noticeable records containing Plaintiff’s publicly stated views supporting and defending theory of the prosecution, confessions of the Five as valid and guilt of the Five for rape <p><i>Def. Memo at 7-9, 18-20.</i></p>

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11.	Ep. 4, 1:09:49- 1:12:43	Scene depicting a 2002 lunch meeting between Fairstein and Lederer characters (Compl. ¶ 128)	<ul style="list-style-type: none"> • Incapable of defamatory meaning • Dialogue is nonactionable opinion/rhetorical hyperbole used for dramatic purposes, particularly when viewed in literary context of dramatization with a clear point of view and scene using imagined dialogue to present different sides of debate • Substantial truth based on public and judicially noticeable records containing Plaintiff's prior public statements of her views that the Five are guilty of attacking the jogger and of rape and that their confessions were not coerced <p><i>Def. Memo at 7-9, 20-21.</i></p>